

ENGINEERING ANALYSIS

American Leakless Company
Facility number 708-0030

On November 23, 2010, the Department received an initial air permit application from American Leakless Company. This company produces automotive gaskets at their new facility in Athens. American Leakless has been operating a coil coating line at Federal Mogul in Athens. Synthetic Minor Operating Permit 708-0020-X020 was issued for this unit in 2006. American Leakless has applied for a permit to move this coil coating line from the Federal Mogul building to their facility. American Leakless would like to start construction for this project in January of 2011.

Emissions

American Leakless has requested synthetic minor source permit limits of 95 tons of volatile organic compounds, 24.5 tons of hazardous air pollutants, and 9.5 tons of any single hazardous air pollutant in any twelve month period. Emissions from the coil coating line will be controlled by an Alstom power air preheat afterburner. Uncontrolled emissions from the coil coater could be up to 570 tons per year of volatile organic compounds, 34 tons per year of hazardous air pollutants, and 19 tons per year of xylene. Actual air emissions from this unit are estimated to be 4 tons per year of volatile organic compounds. The 99.3% control efficiency was determined by a method 25A stack test in 2006. There are no other significant sources of air emissions at the American Leakless facility.

NSPS/NESHAPS

The coil coating line will be subject to applicable parts of the New Source Performance Standards for Metal Coil Surface Coating, 40 CFR 60 subpart TT. 60.462(a)(3) requires that this facility not discharge more than 10 percent of the VOCs applied during each calendar month. 60.464(c) requires that the temperature of the thermal incinerator be recorded continuously. Records of the incinerator temperature, coatings used, and VOC and HAP content of the coatings are required to be kept for at least two years.

No other federal standards would apply to this facility. The National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 subpart HHHHHH, would not apply because the coatings do not contain significant amounts of chromium, lead, manganese, nickel, or cadmium. The NAICS number for a gasket manufacturer is 339991. This NAICS code is not listed for the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source categories, 40 CFR 63 subpart XXXXXX. Most other NESHAPs would not apply because this facility is not a potential major source of hazardous air pollutants.

PSD

This facility will not be subject to PSD because it is not a major stationary source as defined in ADEM Admin Code R. 335-3-14-.04.

State Regulations

The proposed source is not subject to ADEM Admin Code R. 335-3-6 because potential VOC emissions are less than 100 tons per year.

Class I

The American Leakless is approximately 60 kilometers north east of the Sipsey Wilderness Area. This project should not affect the air quality of this class I area because an existing source will be moved approximately 4 kilometers south. Air emissions are not expected to increase.

Public Notice

Public notice is required because this is the first air permit for the American Leakless Company. The American Leakless facility was inspected by the Department on September 22, 2010. It is located at 136 Roy Long Road in Athens. This is directly behind the Steelcase facility in an industrial area south of town.

Recommendations

Since it appears that American Leakless is capable of meeting all applicable state and federal regulations, I recommend issuing the attached permit following the payment of fees and public notice.

Hal Brock
Chemical Branch
Air Division

December 29, 2010

Date